

**UNITED STATES DISTRICT COURT  
For the  
DISTRICT OF RHODE ISLAND**

|   |   |                      |
|---|---|----------------------|
| NATIONAL LIABILITY & FIRE INSURANCE<br>CO. and BOAT OWNERS ASSOCIATION OF<br>OF THE UNITED STATES<br>Plaintiffs | ) |                      |
|   | ) |                      |
|   | ) |                      |
|   | ) | Civil Action:        |
|   | ) | No: 17-cv-0038-S-PAS |
|   | ) |                      |
| v.  | ) | In Admiralty         |
|   | ) |                      |
| NATHAN CARMAN   | ) |                      |
| Defendant.  | ) |                      |
|   | ) |                      |

DEFENDANT, NATHAN CARMAN’S, MEMORANDUM IN SUPPORT OF:

DEFENDANT’S OBJECTIONS TO: THOSE PORTIONS OF JUDGE SULLIVAN’S ORDER  
DATED MARCH 30, 2018 [Doc. #59] DECIDING PLAINTIFFS’ MOTION TO COMPEL  
DEFENDANT’S DEPOSITION TESTIMONY [Doc. # 37]

Now comes the Defendant, Nathan Carman, and pursuant to LR Cv 72(c) files this Memorandum of Law in support of Defendant, Nathan Carman’s, LR Cv 72 Objections to Those Portions of Judge Sullivan’s Order dated March 30, 2018 [Doc. #59] Deciding Plaintiff’s Motion to Compel Defendant’s Deposition Testimony.

The basis of Defendants objections to Judge Sullivan’s Order dated March 30, 2018 as well as the legal and factual arguments supporting these objections are set forth within Defendant, Nathan Carman’s LR Cv 72 Objections [Doc. # 61]. The law, facts and legal arguments supporting these objections are contained within Defendant’s Opposition to Plaintiff’s Motion to Compel Deposition Testimony [Doc. # 51]; Defendant’s Memorandum in Support of Opposition to Motion to Compel Deposition Testimony [Doc. #51-1]; Affidavit of David Anderson [Doc. # 51-2]; the filings cited therein including the attached Exhibits “A” through

“N” [Doc. #51-2 through Doc. # 51-16] Defendant incorporates by reference herein the above identified filings.

WHEREFORE, the Defendant respectfully requests that this Court consider Defendant’s below objections, vacate the objected to portions of Judge Sullivan’s March 30<sup>th</sup> Order and enter a new Order denying Plaintiffs’ Motion to Compel Defendant’s Deposition Testimony [Doc. # 37].

Respectfully Submitted

On behalf of the Defendant,  
Nathan Carman

/s/ David F. Anderson  
David F. Anderson  
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Dated: April 13, 2018

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on the above date, I electronically filed the above pleading with the Clerk of the Court using CM/ECF system which will send notification of such filing(s) to all counsel of record for all parties.

/s/David F. Anderson  
David F. Anderson